

EXHIBIT 1

INSTRUCTIONS

1. In producing documents related to these requests, in the event that multiple copies of a document exist, you are required to produce the original of each document and any and all drafts and/or copies containing marginal notations, interlineations, erasures, or other forms of alteration.

2. In the event you decline to produce any documents within the scope of these requests, please describe each document with reasonable particularity, and separately set forth all reasons for declining to produce the document.

3. You have a continuing duty to supplement your responses to these requests. If you or anyone acting on your behalf obtains or discovers additional responsive information after the time of initial answer or response, you are required to supplement your responses to these requests.

DEFINITIONS

1. “Squirrels” means Squirrels Research Laboratories, LLC.

2. “MDC” means Midwest Date Company, LLC.

3. “Debtors” means Squirrels and MDC, collectively.

4. “Torea” means Torea Consulting, Ltd.

5. “Cards” means the Two Hundred Sixty-Seven (267) Torea cryptocurrency mining boards that were hosted by Squirrels or MDC.

6. “Wallet” shall mean any and all electronic wallet(s) related to the Cards, funds generated by the Cards, wallets where Debtors claims they deposited funds to purchase the Cards, and/or wallets where Debtors claim they deposited rent related to the Cards including, but not limited to, the wallet whose identification number ends is -9fC6.

7. “And” and “or” as used herein are both conjunctive and disjunctive.
8. “Any” shall be construed to include “all,” and “all” shall be construed to include “any.”
9. “Each” shall be construed to include the word “every,” and “every” shall be construed to include the word “each.”
10. The plural shall include the singular and the singular shall include the plural.
11. The present tense shall be construed to include the past tense and the past tense shall be construed to include the present tense.
12. “Relating to,” “relates to,” or “related to” shall mean referring to, relating to, alluding to, responding to, discussing, commenting upon, showing, disclosing, analyzing, reporting about, explaining, mentioning, constituting, comprising, evidencing, setting forth, containing, summarizing, or characterizing, either directly or indirectly, in whole or in part, the given subject matter.
13. A “document” or “documents” is intended to be as comprehensive as the meaning provided in Rules 26 and 34 of the Federal Rules of Civil Procedure, as made applicable by Rules 7026 and 7034 of the Federal Rules of Bankruptcy Procedure, and includes, without limitation, all original written, recorded, or graphic matter of any nature whatsoever, all nonidentical copies thereof, contained in any medium upon which intelligence or information is recorded, in plaintiff’s possession, custody, or control, regardless of where located; including, without limitation, notes, jottings, papers, records, tangible things, communications, letters, memoranda, sound recordings of any nature and transcripts thereof, ledgers, worksheets, expense vouchers or receipts, books, magazines, notebooks, work papers, affidavits, statements, summaries, contracts, agreements, diaries, calendars, appointment books, registers, charts, tables, agreements, contracts, purchase

orders, acknowledgments, invoices, authorizations, budgets, analyses, reports, studies, evaluations, projections, transcripts, minutes of meetings of any kind, correspondence, telegrams, cables, telex messages, teletypes, drafts, movie film, slides, photograph records, photographs, microfilm, data processing disks or tape, and computer produced interpretations thereof, x-rays, printout sheets, punch cards, instructions, announcements, schedules, spreadsheets, price lists, financial statements, balance sheets, income statements, all records kept by electronic, photographic, mechanical, or computer means, and notes or drafts relating to any of the foregoing, and all things similar to any of the foregoing.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Any documents related to or referencing the Cards.
2. Any document related to or referencing any payments you made to rent the Cards.
3. Any document related to or referencing payments you made to purchase the Cards.
4. Any document related to or referencing offers to make payments to purchase the Cards.
5. A performance report related to the Cards from March 3, 2021 to present.
6. Any document that summarizes, notes, or lists a transaction history/data download associated with the Wallet you stored the mined virtual currency in.
7. All Communications, both internal and external, related to you renting the Cards.
8. All Communications, both internal and external, related to you purchasing the Cards.
9. Documents related to your sale or transfer of any of the Cards.
10. Documents that specify the current location of each of the Cards.

MATTERS FOR EXAMINATION

- (i) The current location of each of the Cards.
- (ii) The identity of the individuals or entities that currently own or possess each of the Cards.
- (iii) The identity of each of the Debtors' employees who worked on negotiating your rental and/or proposed purchase of the Cards.
- (iv) An accounting of the virtual currency you have mined using the Cards from March 3, 2021 to present.
- (v) The date you first offered to rent the Cards.
- (vi) The terms under which you rented the Cards.
- (vii) The date you first took control of the Cards.
- (viii) The date you first offered to purchase the Cards.
- (ix) The date you first offered to remit payment for the purchase of the Cards.
- (x) The account(s) where all the Ethereum mined from the Cards currently resides.
- (xi) All transactions related to the Cards from the point they were mined to present.
- (xii) The Wallet(s).